

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

#### VIA FEDERAL EXPRESS

November 27, 2013

### **EPA CERCLA Section 104(e) Request for Information**

Bret A. Stone, Esq. For John Locke Paladin Law Group LLP 21 E. Carrillo Street Santa Barbara, CA 93101

Re: Supplemental 104 (e) Request for Information Related to Omega Chemical Corporation Superfund Site; Angeles Chemical Co., Inc. facility, 8915 Sorensen Avenue, Santa Fe Springs, CA

Dear Mr. Stone:

As you may be aware, the U.S. Environmental Protection Agency ("EPA") is spending public funds to investigate and respond to the release of hazardous substances into soil and groundwater at the Omega Chemical Corporation Superfund Site ("Site") in Los Angeles County, California. As part of its ongoing investigation of the Site, EPA is seeking to determine the nature and extent of contamination at the Site, to assess the effects of contamination on the environment and public health, and to identify activities and parties that have or may have contributed to contamination at the Site.

We have received and reviewed John Locke's July 29, 2013, August 1, 2013 and August 29, 2013 responses relating to 8915 Sorensen Avenue. We appreciate Mr. Locke's responses to EPA's May 29, 2013 Request for Information, and the information provided therewith. Based on our review of Mr. Locke's responses, and our further investigation of the Site, we believe Mr. Locke may have additional information that may assist EPA in its investigation of the Site. Consequently, we are hereby requesting the following additional information from Mr. Locke.

- 1. State the full legal name, address, telephone number, position(s) held by, and tenure of, the individual(s) answering any of these questions on behalf of John Locke concerning the matters herein.
- 2. Provide a copy of the personal federal income tax return (IRS Form 1040) for the years 2007-2012, as filed with the Internal Revenue Service, complete with all schedules and attachments.

- 3. Complete the form entitled "Statement of Net Worth" (enclosed).
- 4. With respect to Question 2(e) in your August 29, 2013 104(e) response, you state that Great American has denied coverage based on exhaustion of funds. Provide information which explains this denial of coverage and exhaustion of funds, including information regarding claims submitted by Angeles Chemical Co., Inc. ("Angeles") prior to May 12, 2012 and the outcome. Provide a description and the amounts of all insurance proceeds paid, and provide information as to how the insurance proceeds have been spent or are planned to be used.
- 5. With respect to Question 2 of your August 29, 2013 104(e) response, state whether you have now provided all of the information requested. Please note that the list of insurance policies to be provided is not limited to those that are still in existence, or which have not yet been exhausted. In addition, your response should include a description of the insured's efforts to file any claims relating to soil and/or groundwater contamination at the Property, under each policy, as well as the outcome of such efforts. To the extent that any additional information is available, provide it.
- 6. With respect to Question 3 in your August 29, 2013 104(e) response, you state that Angeles received two installments totaling approximately \$3.65 million. Regarding the remaining settlement proceeds, state which individuals and/or entities were recipients, the amount(s) allocated, and provide information as to how the settlement proceeds have been spent or are planned to be used.
- 7. With respect to the January 31, 2001 Agreement entered between Greve Financial Services, Inc. and Angeles provided with your August 29, 2013 104(e) response, state whether Angeles received proceeds from Greve Financial Services, Inc.'s sale of the Property pursuant to the conditions set forth in paragraph 8 of the agreement. If the answer is "yes," provide the amount paid, payment date, and how the proceeds have been spent or plan to be used.

EPA has the authority to request this information pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9604(e). Please note that failure to respond fully and truthfully to this request may result in civil actions and penalties.

Please refer to our May 29, 2013 Request for Information (enclosed) for instructions with respect to your response, including instructions as to the assertion of a business confidentiality claim and the determination of the scope of our request. Those instructions continue to apply and are hereby incorporated into this Supplemental Request for Information. Please provide your response, in writing, within <u>fifteen (15) calendar days</u> of your receipt of this letter; we will consider this letter to have been received by you seven calendar days after its date. Your response should be directed to:

Keith Olinger, SFD-7-5 U.S. Environmental Protection Agency, Region IX Superfund Division

# 75 Hawthorne Street San Francisco, California 94105

If you have questions regarding this Information Request, please contact Steve Berninger, Assistant Regional Counsel, at (415) 972-3909, or Keith Olinger, Enforcement Officer, at (415) 972-3125. If you have questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of cleanup activities, please contact Lynda Deschambault at (415) 947-4183.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,

Kathi Moore, Manager

Case Development/Cost Recovery Section

Site Cleanup Branch Superfund Division

#### Enclosures (2):

- May 29, 2013 Request for Information
- Statement of Net Worth

cc: Steve Berninger, EPA Lynda Deschambault, EPA Keith Olinger, EPA



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

#### Via FedEx and Email

May 29, 2013

#### **EPA CERCLA Section 104(e) Request for Information**

Bret A. Stone, Esq. For John G. Locke Paladin Law Group LLP 21 E. Carrillo Street Santa Barbara, CA 93101

Re: 104 (e) Request for Information – Omega Superfund Site

Angeles Chemical Co., Inc. Facility, 8915 Sorensen Avenue, Santa Fe Springs, CA

Dear Mr. Stone:

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and respond to the release or threatened release of hazardous substances into the soil and groundwater at the Omega Chemical Corporation Superfund Site (the "Site"). The Site includes the former location of a used solvent and refrigerant recycling, reformulation, and treatment facility ("Omega Chemical") located at 12504 and 12512 Whittier Blvd. in Whittier, California. The term "Site", as used herein, refers to both the former Omega Chemical property and the areal extent (i.e., plume) of contaminated groundwater emanating from the Omega Chemical property.

In order to facilitate cleanup of hazardous substances at the Site, EPA divided the Site into three operable units ("OUs"): OU-1, OU-2 and OU-3. OU-1 is the former Omega facility and immediate vicinity. OU-2 is the extent of contamination in groundwater that originated from the former Omega facility and now extends more than four miles downgradient of OU-1. The contamination in groundwater has commingled with chemicals released at other source areas. OU-3 refers to indoor air contamination from the Omega Site that has occurred in several buildings near the Omega Chemical property.

Groundwater investigations to date suggest that operations at various facilities in the area, in addition to the former Omega Chemical facility, have contributed to groundwater contamination through the use of volatile organic compounds ("VOCs"), including perchloroethylene ("PCE"), trichloroethylene ("TCE"), Freons 11 and 113, and other contaminants.

As part of its ongoing investigation of the Site, EPA is seeking to determine the nature and extent of contamination at the Site, to assess the effects of contamination on the environment and public health, and to identify activities and parties that have or may have contributed to contamination at the Site. EPA believes that you may have information that may assist EPA in its investigation.

We request that you provide a complete and truthful written response to this Information Request and questions in Enclosure B within thirty (30) calendar days of your receipt of this letter. Instructions on how to respond to the questions are described in Enclosure A. Please return your written response to:

Keith Olinger, SFD-7-5 U.S. Environmental Protection Agency, Region IX Superfund Division 75 Hawthorne Street San Francisco, California 94105

Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9604(e), EPA has broad information-gathering authority which allows EPA to require persons to furnish information or documents relating to:

- (a) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility;
- (b) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility; and
- (c) Information relating to the ability of a person to pay for or perform a cleanup.

Please note that your compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to \$37,500 per day of noncompliance. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Some of the information EPA is requesting may be considered by you to be confidential business information ("CBI"), as described in Title 40 of the Code of Federal Regulations, Subchapter A, Part 2, Subpart B (40 C.F.R., §2.201, et seq.). Please be aware that you may not withhold the information upon that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Enclosure A, including the requirement for supporting your claim for confidentiality. Please be aware that EPA will maintain information consistent with the Privacy Act of 1974, 5 U.S.C. §552a, as amended.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§1320.4 and 1320.6(a).

Your response should include the appropriate name, address, and telephone number of the person to whom EPA should direct future correspondence in regard to this matter on behalf of your company.

If you have questions regarding this Information Request, please contact Steve Berninger, Assistant Regional Counsel, at (415) 972-3909, or Keith Olinger, Enforcement Officer, at (415) 972-3125. If you have questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of cleanup activities, please contact Lynda Deschambault at (415) 947-4183.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,

Kathi Moore, Manager

Case Development/Cost Recovery Section

Site Cleanup Branch Superfund Division

Enclosures (2)

cc: Steve Berninger, EPA Lynda Deschambault, EPA Keith Olinger, EPA

#### **ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS**

### **Instructions:**

- 1. <u>Answer Each Question Completely.</u> A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained. For the definition of "you" and other terms, please see the Definitions section below.
- 2. <u>Number Each Answer.</u> When answering the questions in Enclosure B, please precede each answer with the corresponding number of the question and subpart to which it responds.
- 3. <u>Number Each Document.</u> For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
- 4. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
- 5. <u>Identify Sources of Answer.</u> For each question, identify all the persons and documents that you relied on in producing your answer.
- 6. <u>Continuing Obligation to Provide/Correct Information.</u> If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA.
- 7. <u>Scope of Request.</u> The scope of this request includes all information and documents independently developed or obtained by research on the part of your company, its attorneys, consultants or any of their agents, consultants or employees.
- 8. <u>Confidential Information</u>. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

- a. clearly identify the portions of the information alleged to be entitled to confidential treatment;
- b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
- c. measures taken by you to guard against the undesired disclosure of the information to others;
- d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith:
- e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.
- g. To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all nonconfidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.
- h. All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.
- 9. <u>Disclosure to EPA's Authorized Representatives.</u> Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. The authorized representatives of EPA to which EPA may disclose information contained in your response are as follows:

Department of Toxic Substances Control/ California Environmental Protection Agency Toeroek Associates, Inc. EPA Contract Number EP-BPA-11-W-001

Science Applications International Corporation EPA Contract Number EP-BPA-11-W-001

CH2M Hill, Inc. EPA RAC Contract Number EP-S9-08-04

Toeroek Herndon Joint Venture EPA Contract Number EP-R9-12-02

ITSI, Inc. EPA RAC Contract Number EP-S9-08-03

Techlaw EPA ROC Contract Number EP-W-07-066

Any subsequent additions or changes in EPA contractors who may have access to your response to this Information Request will be published in the Federal Register.

This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, inventory, and indexing; to assist with document review and analysis for verification of completeness; or to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. §2.310(h), you may submit comments on EPA's disclosure of any confidential information contained in your response by EPA to its authorized representatives along with the response itself, within the thirty (30) calendar day period in which the response is due.

10. <u>Objections to Questions</u>. If you have objections to some or all of the questions contained in the Information Request letter, you are still required to respond to each of the questions.

#### Definitions:

- 1. The term "you" or "Respondent" should be interpreted to include the addressee of this Information Request, and its officers, managers, employees, contractors, trustees, successors, assigns and agents.
- 2. The term "person" shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
- 3. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.
- 4. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.

- 5. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
- 6. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
- 7. The term "pollutant or contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.
- 8. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
- 9. The term "document" includes any written, recorded, computer generated or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

#### **ENCLOSURE B: QUESTIONS (INFORMATION REQUEST)**

Note: The term Property refers to the property located at 8915 Sorensen Avenue, Santa Fe Springs, California.

- 1. State the full legal name, address, telephone number, positions(s) held by, and tenure of, the individual(s) answering any of these questions on behalf of John G. Locke concerning the matters set forth herein.
- 2. Identify and provide copies of all property, pollution, casualty, environmental and/or liability insurance policies, and any other insurance contracts referencing the Property or facilities located at the Property, held by you from the time Angeles Chemical Co., Inc. began operations at, or assumed ownership of (whichever occurred earlier), the Property until the present. In identifying such policies, state:
  - a. The name and address of each insurer and of the insured;
  - b. The type of policy and policy numbers;
  - c. The effective dates for each policy;
  - d. The per occurrence policy limits of each policy;
  - e. A description of the insured's efforts to file any claims relating to soil and/or groundwater contamination at the Property, under each policy, as well as the outcome of such efforts; and
  - f. Identify all insurance brokers or agents who placed insurance for you at any time during the investigation period you identify above. Identify by name and title, if known, individuals at the agency or brokerage most familiar with your property, pollution and/or liability insurance program and the current whereabouts of each individual, if known.
- 3. EPA information indicates that in the matter of <u>Angeles Chemical Co., Inc., et al. v.</u>

  <u>McKesson Corp., et. al.</u> a \$4.55 million settlement was agreed to between the parties, including John Locke, as set forth in a Settlement Agreement effective January 5, 2010. State the amount John Locke received from the allocation of settlement proceeds and provide information as to how the settlement proceeds have been spent or plan to be used.
- 4. Describe any agreement, whether written or verbal, to which you are a party concerning the environmental conditions, cleanup or remediation of the Property. Include a description of any ongoing obligations related to the Property. As part of your response, describe each part of the agreement not in writing; provide the name, address and telephone number of each person agreeing to that provision; and provide the date that part of the agreement was made. Provide any documents evidencing such an agreement.



June 7,2013

Dear Customer:

The following is the proof-of-delivery for tracking number **546221780370**.

**Delivery Information:** 

Status: Delivered Signed for by: C.MEDINA

C.MEDINA De

Delivered to:Receptionist/Front DeskDelivery location:SANTA BARBARA, CA

May 30, 2013 10:33

**Service type:** FedEx Priority Overnight

Special Handling: Deliver Weekday

Direct Signature Required

Signature image is available. In order to view image and detailed information, the shipper or payor account number of the shipment must be provided.

Delivery date:

**Shipping Information:** 

**Tracking number:** 546221780370 **Ship date**: May 29, 2013

Weight: 0.5 lbs/0.2 kg

Recipient: Shipper:

SANTA BARBARA, CA US Oakland, CA US

**Reference** 9032-006

Thank you for choosing FedEx.

#### STATEMENT OF NET WORTH

Please provide the following information to the best of your ability. Data should be as current as possible. Estimates are acceptable; please note all estimates with an "E".

If you are the sole proprietor of a business, please list business assets and liabilities in addition to personal assets and liabilities. Please list the business assets and liabilities on a separate form.

## 1. BANK ACCOUNTS (Checking, NOW, Savings, Money Market, CDs etc.)

Describe and state ownership and value of any account or shares held by (1) you, (2) your spouse, (3) your dependents, or (4) anyone on your behalf in any bank, building and loan association, saving institution, cooperative, or credit union.

Name and Address of Bank or Institution	Type of Account	Current Balance
1.		
2.		
3.		
4.		
5.		
For Agency Use only - Total Current Balance in Bank Accounts		

2. INVESTMENTS (Stock, Bonds, Mutual Funds, Options, Futures, Real Estate Investment trusts, etc.)

Investment	Number of Shares or Units	Current Market Value
1.		
2.		
3.		
4.		
5.		
For Agency Use Only - Total Estimated Market Value o		

3. RETIREMENT FUNDS AND ACCOUNTS (IRA, 401(k), Keogh, vested interest in company retirement)

Description of Account	Estimated Market Value		
1.			
2.			
3.			
4.			
For Agency Use Only - Total Estimated Value of Retirement Funds and Accounts			

date, face value, and cash surrender Policy Holder	Issuing Co		Policy Value	Cash Value
1.	Issuing Co	- Inpuny	1 oney value	Cushi varae
2.				
3.				
4.				
5.				
For Agency Use Only - Total Value of	I ife Insurance Policies			
Total Value of	Elie insurance i oncies			
5a. VEHICLES USED FOR COM	MUTING PURPOSES	SONLY		
Brand and M		Year	Estimated Ma	arket Value
1.				
2.				
For Agency Use Only - Total Estimate	ed Market Value of Vehicle	es		
5b. OTHER VEHICLES (Cars, T		otor Homes, Trai	<del></del>	
Brand and M	odel	Year	Estimated Market Value	
1.				
2.				
3.				
4.				
For Agency Use Only - Total Estimate	d Market Value of Vehicle	es		
6. Personal Property (Describe th				
Precious Metals, etc. valued at \$ 1		or \$ 5000 or more	in the aggregate o	wned by (1)
you, (2) your spouse, or (3) your d			1	
Тур	e of Property		Estimated Ma	arket Value
1.				
2.				-

Type of Property	Estimated Market Value
1.	
2.	
3.	
4.	
5.	
For Agency Use Only - Total Estimated Market Value of Personal Property	

7a. REAL ESTATE - PRIMARY RESIDENCE (Home-List only one such residence)

Location	Legal Description of Property	Estimated Market Value

7b. OTHER REAL ESTATE (Land, Buildings, Land with Buildings, Mineral Rights)

Location	Legal Description of Property	Estimated Market Value
1.		
2.		
3.		
4.		
5.		
For Agency Use Only - Total Es		

8. OTHER ASSETS
8a. Have you made or do you hold or own, or have a lien upon, any claim by suit or otherwise against the United States or any other party?
8b. (i) Do you have any vested or contingent future interest in any property, or to the payment of any money, for any reason whatsoever?
(ii) If so, state the nature and source of such interest, the location of the property, the identity and address of any person or institution that may be involved, the circumstances that will cause the property or money to inure to your benefit, and the probable value or amount thereof.
8c. (i) Is any money or property held in trust for (1) you, (2) your spouse, or (3) your dependents?
(ii) If so, state the name and address of the trustee or other fiduciary, identify the trust, state what monies or property are held in trust, the value thereof, and the date upon which the trust is to terminate.
8d. If any monies or property are held in trust for (1) you, (2) your spouse, or (3) your dependents, state the amount of income which is or may be received there from, the timing of such payments, give the value of the corpus of trust which may be distributed to (1) you, (2) your spouse, or (3) your dependents, and the expected date of distribution.

	Type	of Asset	Est	imated	Market	Value
or Agency Use Only -	Total Other Assets					
			<u>I</u>			
CREDIT CARDS A				ъ	1 5	
Credit Card/Line of Cr	redit (Type)	Owed To		В	alance I	Jue
2.						
3.						
•						
·						
San Assert Har Oak	T. (1 D. 1 D.	Contractor IV				
or Agency Use Only -	Total Balance Due or	Credit cards and Lines of Credit				
VEHICLE LOAN	IS (Cars Trucks I	Motorcycles, Motor Homes, Travel	Trailers Ai	rnlane	s etc)	
Vehicle Vehicle	b (Cars, Trucks, I				Start	End
(Model and Year)		Owed To	Balance	Due	Date	Date
or Agency Use Only -	Total Balance Due or	Vehicle Loans				
			•			
. FURNITURE AN	D HOUSEHOLD	GOODS LOANS			<b>a</b>	
Type of Loan		Owed To Balance D		Due	Start Date	End Date
					Date	Date
			_			
2.						
2.						
2. 3.	Total Balance Due - I	Furniture & Hhg Loans				
2. 3. 4.	Гotal Balance Due - I	Furniture & Hhg Loans				
2. 3. 4. For Agency Use Only -						
G. Gor Agency Use Only - '	ND REAL ESTAT	TE LOANS	Relance	Duo	Start	End
2. 3. 4. For Agency Use Only - 7			Balance I	Due	Start Date	End Date
For Agency Use Only - '  MORTGAGES A  Type of Loan	ND REAL ESTAT	TE LOANS	Balance I	Due		l
1. 2. 3. 4. For Agency Use Only - 7  2. MORTGAGES A  Type of Loan  1.	ND REAL ESTAT	TE LOANS	Balance I	Due		l
For Agency Use Only - '  MORTGAGES A  Type of Loan	ND REAL ESTAT	TE LOANS	Balance I	Due		l

# 13. OTHER DEBT (Amounts due to individuals, Fixed Obligations, Taxes Owed, Overdue Alimony Child Support, etc.)

13a.	Are any suits or judgments pending against you?
13b whethe	If so, state the full details, including the dates and amounts of recent payments thereon made for you and er your salary has been garnished and by whom.

Type of Debt	Owed To	Balance Due	Start Date	End Date
1.				
2.				
3.				
4.				
5.				
For Agency use only - Total Balance Due on				



December 3,2013

Dear Customer:

The following is the proof-of-delivery for tracking number **546221781620**.

**Delivery Information:** 

Status: Delivered Delivered to: Receptionist/Front Desk

Signed for by: .MEDINA **Delivery location:** FOR ANGELES CHEMICAL

CO INC

SANTA BARBARA, CA

93101

Service type: FedEx Priority Overnight

Special Handling: Deliver Weekday

Direct Signature Required

Delivery date:

Dec 2, 2013 09:13



**Shipping Information:** 

Tracking number: Ship date: 546221781620 Nov 27, 2013

Weight: 0.5 lbs/0.2 kg

Recipient:

Shipper: Bret A. Stone, Esq. Omega Paladin Law Group LLP Toeroek Associates, Inc.

for John Locke 1300 Clay Street 21 E. Carrillo St. Suite 450

SANTA BARBARA, CA 93101 US Oakland, CA 94612 US

Reference 9063-006

Thank you for choosing FedEx.